

Mao Exhibit 26

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IOWA PUBLIC EMPLOYEES'
RETIREMENT SYSTEM, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION,
et al.,

Defendants.

Case No. 17-cv-6221 (KPF) (SLC)

Hon. Katherine Polk Failla

**DECLARATION OF DANIEL L. BROCKETT IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

Pursuant to 28 U.S.C. § 1746, I, Daniel L. Brockett declare as follows:

1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). Quinn Emanuel, along with Cohen Milstein Seller & Toll, PLLC (“Cohen Milstein”), is interim co-lead counsel (“Co-Lead Counsel”) for the class in the above-captioned action (the “Action”). I have been actively involved in prosecuting this Action from the beginning, and have personal knowledge of the matters set forth herein.

2. The specifics of the work performed by Quinn Emanuel attorneys and staff are set forth in the concurrently filed Joint Declaration.

3. Attached as Exhibit A is a schedule indicating the amount of time spent by Quinn Emanuel attorneys and professional support staff who were involved in this Action from inception through February 29, 2024. The schedule was created from contemporaneous daily time records regularly prepared and maintained by my firm. Exhibit A does not include timekeepers that have billed less than 20 hours, nor any time spent by Quinn Emanuel attorneys in connection with the application for attorneys’ fees and expenses.

4. In calculating our “lodestar,” we present the data in two formats. The first uses Quinn Emanuel’s standard rates that are charged to clients for hourly-rate engagements using the rate schedule in effect when the work was performed (the “historic rate” lodestar). We also calculate the lodestar using the current rates for the timekeepers (the “current rate” lodestar). Under either format, document reviewers hired through a third-party vendor were included in lodestar at a conservative rate of \$300 per hour.

5. Attached as Exhibit B is a schedule indicating the amount of expenses incurred by Quinn Emanuel in connection with this action from inception through March 15, 2024. These expenses are all reflected on the books and records of Quinn Emanuel. These books and records

are prepared from expense vouchers, check records, and other source materials and are an accurate record of the out-of-pocket expenses we incurred in prosecuting the Action. None of the expenses were incurred in connection with the application for attorneys' fees and expenses.

6. As described in the declaration of Mr. Eisenkraft, a common litigation fund was set up and managed by Cohen Milstein. Quinn Emanuel made contributions to the litigation fund. Those contributions are not included in Exhibit B. Rather, to ensure expenditures are only single-counted, the expenses incurred by the common fund are described and accounted for only in Mr. Eisenkraft's declaration.

7. The "document creation and reproduction" expense category refers to costs such as copying costs, binding costs, document scanning, and similar services, as well as for court reporters and videographers. Projects involving third-party vendors are passed through at-cost. There are no administrative charges included in these figures.

8. The "document delivery" expense category includes things like postage and filing fees, but also charges from vendors that provide service of process. There are no administrative charges included in these figures.

9. The "document hosting" expense category is for charges incurred in hosting electronic documents. There are no administrative charges included in these figures.

10. The "electronic legal research" expense category includes such charges as WestLaw, Lexis-Nexis, and PACER. These charges reflect only out-of-pocket payments to the vendors for research done in connection with this Action. Online research is billed based on actual time usage at a set charge by the vendor. There are no administrative charges included in these figures.

11. The “outside professional services” expense category is by far the largest. This category includes our experts and consultants. The extensive and important work of our experts and consultants is outlined in the Joint Declaration.

12. The “telephone, conference fees, etc.” category is for telephone services, primarily for charges in holding multi-party conference calls. These are amounts paid to third party vendors. There are no administrative charges included in these figures.

13. The final category is for “travel and meals.”

14. Attached as Exhibit C are brief biographies of Quinn Emanuel as a firm and many of the individual attorneys who worked on this Action.

* * *

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed May 8, 2024
New York, New York



Daniel L. Brockett

EXHIBIT A

Exhibit A

Quinn Emanuel Time Report
As-of February 29, 2024

Name*	Current Position	Hours	Lowest Historic Rate	Highest Historic Rate	Historic Rate Lodestar	Current Rate**	Current Rate Lodestar
Blair Adams	Partner	32.0	765	765	\$24,480.00	1645	\$52,640.00
Daniel Brockett	Partner	3,289.9	1175	2410	\$5,448,323.00	2410	\$7,928,659.00
Deborah Brown	Partner	1,356.0	1045	1260	\$1,612,222.50	1810	\$2,454,360.00
Jeremy Andersen	Partner	295.7	975	1810	\$392,676.50	1810	\$535,217.00
Jonathan B. Oblak	Partner	182.2	1150	1200	\$214,940.00	1855	\$337,981.00
Maaren Shah	Partner	203.9	915	1050	\$187,171.50	1735	\$353,766.50
Sami H. Rashid	Partner	117.9	940	940	\$110,826.00	1735	\$204,556.50
Sascha Rand	Partner	2,814.6	1110	1865	\$3,795,716.50	1995	\$5,615,127.00
Steig D. Olson	Partner	1,774.5	1025	1810	\$2,172,595.50	1810	\$3,211,845.00
William Sears	Partner	129.9	725	860	\$96,357.50	1645	\$213,685.50
Daniel Mach	Of Counsel	5,061.2	850	1170	\$4,974,678.00	1170	\$5,921,604.00
Jonathan C. Eser	Of Counsel	1,888.4	885	1170	\$1,896,550.00	1170	\$2,209,428.00
Justin Reinheimer	Of Counsel	1,194.8	885	1015	\$1,113,460.50	1570	\$1,875,836.00
Thomas J. Lepri	Of Counsel	316.2	860	1000	\$280,019.50	1570	\$496,434.00
Akilesh Shastri	Attorney	242.3	390	390	\$94,497.00	1395	\$338,008.50
Alanna D. Martin	Attorney	984.6	450	450	\$443,070.00	580	\$571,068.00
Alcides Mulgrave	Attorney	1,444.0	200	380	\$450,080.00	1515	\$2,187,660.00
Andrew Mollard	Attorney	3,487.2	385	1100	\$2,291,251.00	1345	\$4,690,284.00
Andrew Sutton	Attorney	72.0	630	670	\$45,408.00	1510	\$108,720.00
Amen Toumajan	Attorney	895.3	200	900	\$485,170.00	1515	\$1,356,379.50
Avi Grunfeld	Attorney	2,421.4	695	1465	\$2,084,835.50	1465	\$3,547,351.00
Brendan Carroll	Attorney	80.0	610	770	\$54,673.50	1515	\$121,200.00
Daniel Needleman	Attorney	143.7	380	380	\$54,606.00	1515	\$217,705.50
Daphna Heisler	Attorney	1,348.6	200	380	\$424,124.00	1515	\$2,043,129.00
David Draisin	Attorney	1,494.7	200	380	\$480,146.00	1515	\$2,264,470.50
David LeRay	Attorney	2,528.1	765	1515	\$2,551,523.00	1515	\$3,830,071.50
Derek Hoss	Attorney	1,448.1	200	380	\$448,650.00	1515	\$2,193,871.50
Elizabeth Kunkel	Attorney	1,130.4	200	380	\$341,712.00	1515	\$1,712,556.00
Eric Hsu	Attorney	1,250.1	815	925	\$1,085,817.00	1000	\$1,250,100.00
Greg Kanyicska	Attorney	860.5	200	380	\$228,638.00	1515	\$1,303,657.50
John Volpe	Attorney	1,219.4	400	815	\$810,612.50	580	\$707,252.00
Joseph Bowley	Attorney	1,525.7	200	380	\$489,622.00	1515	\$2,311,435.50
Karen Rick	Attorney	1,247.2	200	900	\$766,740.00	1515	\$1,889,508.00
Kenneth Tanzer	Attorney	1,381.2	200	380	\$432,156.00	1515	\$2,092,518.00
Lily Lu	Attorney	1,282.2	200	900	\$806,780.00	1030	\$1,320,666.00
Max Meadows	Attorney	3,445.4	560	1345	\$2,582,840.00	1465	\$5,047,511.00
Michelle Gesser	Attorney	655.0	200	380	\$200,030.00	1515	\$992,325.00
Morgan Brady	Attorney	2,313.1	380	450	\$1,009,052.00	580	\$1,341,598.00
Nicholas Gerschman	Attorney	1,742.5	670	920	\$1,397,334.50	920	\$1,603,100.00
Nicolas Siebert	Attorney	4,035.3	390	1395	\$2,633,144.00	1395	\$5,629,243.50
Samuel Maynard	Attorney	1,307.7	200	380	\$410,580.00	1515	\$1,981,165.50
Sebastian Becker	Attorney	257.8	390	870	\$122,373.50	1305	\$336,429.00
Thomas Popejoy	Attorney	722.7	610	770	\$476,543.00	780	\$563,706.00
Tim Hamilton	Attorney	695.5	200	900	\$264,960.00	1515	\$1,053,682.50
Todd Riegler	Attorney	596.2	475	475	\$283,195.00	580	\$345,796.00
Tom Barnes	Attorney	80.60	670	695	\$55,372.00	1510	\$121,706.00
Ty Adams	Attorney	3,054.4	385	920	\$2,248,509.00	1065	\$3,252,936.00
Vladimir Bass	Attorney	1,044.8	200	380	\$304,162.00	1515	\$1,582,872.00
Alexander Natanzon	Out. Con. Atty.	1,495.0	300	300	\$448,500.00	300	\$448,500.00
Curtis Caddell	Out. Con. Atty.	463.9	300	300	\$139,170.00	300	\$139,170.00
Edward Jen	Out. Con. Atty.	1,409.0	300	300	\$422,700.00	300	\$422,700.00
Hope Holiday	Out. Con. Atty.	815.5	300	300	\$244,650.00	300	\$244,650.00
Matthew Kleckner	Out. Con. Atty.	603.0	300	300	\$180,900.00	300	\$180,900.00
Sarah Higgins	Out. Con. Atty.	1,299.0	300	300	\$389,700.00	300	\$389,700.00
Scott Fleming	Out. Con. Atty.	684.5	300	300	\$205,350.00	300	\$205,350.00
Stepanie Peter	Out. Con. Atty.	730.0	300	300	\$219,000.00	300	\$219,000.00
Brian M Lee	Paralegal	299.3	355	375	\$108,987.50	375	\$112,237.50

Daisy Koch	Paralegal	1,383.8	330	355	\$470,311.50	355	\$491,249.00
Dave Scholz	Paralegal	36.8	250	415	\$14,591.00	550	\$20,240.00
Fiona Gately	Paralegal	265.9	320	355	\$92,535.50	355	\$94,394.50
Hailey Kay	Paralegal	2,494.4	330	375	\$886,379.00	375	\$935,400.00
Juliette Jacobson	Paralegal	1,006.0	375	515	\$390,396.00	515	\$518,090.00
Pamela Rattinger	Paralegal	77.4	310	330	\$24,507.00	335	\$25,929.00
Quentin Cohan	Paralegal	888.8	320	345	\$293,959.00	345	\$306,636.00
Sam Stuart	Paralegal	70.8	415	550	\$31,549.50	550	\$38,940.00
Sarah Cook	Paralegal	61.1	310	310	\$18,941.00	320	\$19,552.00
Stephanie Peterson	Paralegal	47.8	310	320	\$14,994.00	320	\$15,296.00
Boris Sobrevilla	Lit. Support	27.9	175	175	\$4,882.50	190	\$5,301.00
Brahim Benni	Lit. Support	23.3	175	175	\$4,077.50	190	\$4,427.00
Ho Man Chan	Lit. Support	27.6	175	175	\$4,830.00	190	\$5,244.00
James Bandes	Lit. Support	38.8	250	250	\$9,700.00	270	\$10,476.00
Joe Liao	Lit. Support	546.4	175	175	\$95,620.00	190	\$103,816.00
K. Dementiev	Lit. Support	28.2	175	175	\$4,935.00	190	\$5,358.00
TOTAL		79,919.1			\$53,899,389.50		\$96,283,378.00

* Does not include timekeepers with less than 20 hours.

** "Current Rate" for timekeepers that left the firm are the rates in effect as-of the time the timekeeper left the firm.

EXHIBIT B

Exhibit B**Quinn Emanuel Expense Report**
As of March 15, 2024

Category	Amount
Document creation and reproduction (court reporter, videographer, copying, binding, etc.)	\$358,489.09
Document delivery (postage, messengers, filing fees, etc.)	\$33,196.78
Document hosting	\$24,139.84
Electronic legal research (Westlaw, Lexis, etc.)	\$137,901.87
Outside professional services	\$2,972,870.49
Telephone, conference fees, etc.	\$1,282.01
Travel and Meals	\$87,165.09
TOTAL	\$3,615,045.17